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United States Fire Insurance Company

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

COPART INC.,

Plaintiff,

vs.

CRUM & FORSTER INDEMNITY
COMPANY,¹ UNITED STATES FIRE
INSURANCE COMPANY, and DOES 1-10,

Defendants.

AND RELATED COUNTERCLAIMS.

Case No.: C 07 02684 CW

**NOTICE OF MOTION AND MOTION
TO COMPEL FURTHER RESPONSES
TO DOCUMENT REQUESTS AND
FURTHER PRODUCTION OF
DOCUMENTS**

Date: TO BE SET

Time:

Courtroom:

¹ Dismissed by Order Upon Stipulation (6/15/07).

1 TO PLAINTIFF AND ITS ATTORNEY OF RECORD:

2 PLEASE TAKE NOTICE THAT ON _____, 2007 at _____ a.m./pm or
3 as soon thereafter as the matter may be heard in the above-referenced Court located at
4 _____, defendant U.S. Fire Insurance Company will move this Court for
5 an order compelling plaintiff Copart Inc. to furnish further responses to U.S. Fire's Document
6 Requests and to further produce documents.

7 This motion is made on the grounds that the documents requested are relevant to the
8 subject matter of the action and do not relate to privileged matters, and the refusal to produce
9 the requested documents is without any justification.

10 This motion will be based on this Notice of Motion and Motion, the Memorandum of
11 Points and Authorities filed herewith, the attached Declaration of Samuel H. Ruby, the attached
12 Statement of Discovery Requests and Responses In Dispute and the complete files and records
13 in this action.

14 DATED: November 28, 2007

15 BULLIVANT HOUSER BAILEY PC

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17 By /s/ Samuel H. Ruby
18 Samuel H. Ruby

19 Attorneys for Defendant United States Fire
20 Insurance Company
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